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December 4, 2019

via ECF

Hon. Kenneth M. Karas, U.S.D.J.
United States District Court
300 Quarropas Street, Chambers 533
White Plains, NY 10601-4150

Re: **Strike 3 Holdings, LLC, v. Adosh Mehta**
Case no. 7:19-cv-07027-KMK
• Motion and Stipulation Extending Time to Respond to Complaint

Dear Judge Karas:

I represent the defendant in the above matter. Please allow this letter to serve as a Motion to Extend the Defendant's Time to Respond to the Amended Complaint filed. A proposed Stipulation Extending Time to Respond to Complaint is attached hereto. Plaintiff consents to this request for twenty-one (21) days, which would fall on Christmas Day, a legal holiday. Therefore, the request is to extend the time until December 26, 2019.

Defendant's response to the Complaint is due to be filed by the end of Wednesday, December 4, 2019. There has been no previous request to extend defendant's time to file a response to the Amended Complaint. Defendant apologizes to the Court and opposing counsel for filing this Motion less than two (2) days before the deadline to file defendant's response to the Complaint. The parties have been going back and forth in settlement negotiations since November 20, providing bank statements, etc., with the hope and expectation of resolving this matter before any responsive pleading would need to be filed. The parties anticipate some back and forth in the negotiations before we know whether the case can be resolved amicably, or whether a responsive pleading is needed, leading towards discovery, and so forth.

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Accordingly, for the foregoing reasons, defendant respectfully requests that the Court grant this Motion and enter an Order on the attached Stipulation Extending Time to Respond to the Complaint.

Respectfully submitted

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LAF:beg

cc: Jacqueline M. James, Esq. (*via ECF*)